

In the United States District Court
for the Western District of Pennsylvania -
date 7/8/2005

Preston Catchings

vs

Mr. Morrow et. al.,

Civil Action No. 03-284 ERB

MOTION FOR SANCTIONS

Now comes Plaintiff Preston Catchings, inst. No. BJ8956, seeking Court ORDERED SANCTION, pursuant to FEDERAL Rules of Civil Procedure, Rule 31(a)(2)(B), (3), (4), 37(B)(2)(D) AND (E), 37(C)(1), AND 37(A), IN 37(b)(1) AND 42 PA. C.S.A. § 2. 4619 SANCTIONS.

Plaintiff Avers that he has made in numerous "good faith efforts" to Aquire discovery, testing procedure's, medical and psychiatric document witnesses list and other tangible things requested, in petition/request for inspection and copying of documents, Motion to Compel, and at the HEARING, on Motion to Compel, which includes colloquy concerning Motion for Default Judgment. Therefrom, derived, a Court Order. Plaintiff avers that all herein stated SANCTIONS will tend to exposing All fraudulent document, DECLARATIONS and policies, the discovery will bring to fact finder's ATTENTION the many mis-representations of medical documents and false ¹⁰ psychiatric reports imposed upon this Court and Plaintiff, while strategically implementing Delitory acts and facts, in process to consummate Preston, Catchings death. Plaintiff Avers that he's not received any requested discovery.

SANCTIONS REQUESTED

Plaintiff or Aggrieved Plaintiff Catchings inst. No. BJ8956, re-

(1) psychiatric reports..

quests that all SANCTIONS BESEECHED within this Motion for SANCTIONS, The Motion to COMPEL, requested in the Detain IT Judgment Motion, BE GRANTED PLAINTIFF AND ORDERED effective immediately. The immediate SANCTION ARE NECESSARY to the SUSTAINANCE of LIFE, (1) TRANSFER to (SCI) STATE Correctional Institution LAUREL HIGHLAND, (D.O.C) Department of Corrections MEDICAL facility, UNDER THE AMERICANS with DISABILITIES ACT of 1990, 42 U.S.C § 12101, ET. SEQ. AND 42 U.S.C. § 12132, MOREOVER, UNDER THE REHABILITATION ACT 29 U.S.C. § 706(2)(B), AND THE (D.O.C) Department of Corrections, ACCOMMODATIONS for inmates with DISABILITIES (DC-ADM 006) AN. VIII. Medical Services (DC-ADM 820), BECAUSE a Liver Disease of this magnitude requires, specific types of medical care, UNAVAILABLE AT ANY OTHER INSTITUTION in PENNSYLVANIA, OR TRANSFER to a FEDERAL facility adequate to treatment for VARIOUS DISEASE'S, includes but not limited to, "Arteriosclerosis an CANCER", "CREATINE in antigen therapy", in accord with this therapy is the PREREQUISITE REMEDIAL monetary sum (50,000) fifty thousand DOLLARS, essential for the REHABILITATION of phagocytosis, BARRIERS, Antifony mediated immune RESPONSES, Lymphocytes, T-cells an B-cells, moreover, REHABILITATION of BURNED CANCEROUS TISSUE, within the METABOLISM SYSTEM, including The stomach, PANCREAS, BLADDER, KIDNEY'S an THE LIVER, NECESSARY to employ the SERVICES of A NUTRITION Specialist to ASSIST in the CREATION of A ANTIBODY biochemical SYNTHETIC & VITAMIN, AND to ADVISE AND OR DEVISE with PLAINTIFF other TYPES of ASSISTANCE VITAL to THE PROCESS of REHABILITATION, subsuming ANY SPECIAL SURGICAL manuvers to REMOVE CANCEROUS TISSUE, IN THE FORM of Direct MONETARY PAYMENT of (50,000) DOLLARS IN A ACCOUNT UNDER THE NAME Preston Cutchings,

The Department of Corrections PAY THE COST'S of MED-

① AND BEARS on the DAMAGES to the Liver an other ORGANS DURING THESE DILATORY FEATS; reflects the DISEASE inflected, the INJURIES imposed an THE FACTS of THE CONTINUATION of ASSAULTS taking PLACE AT PRESENT,

3 of 7

cal testing requested in the petition. Production of documents (\$5,000) sixty five thousand dollar's to be put in a special account, payable to the chosen medical personal, the terms of which shall be dictated by plaintiff. Preston Catchings #BJ8956, without hindrance to its access, or delays in its transference to the Doctor's accounts. . . . The Aggrieved Preston Catchings #BJ8956, to be transferred temporarily to a outside hospital in Cambria County for purposes of independent medical testing in accord with Federal Rules Civil Procedure, Rule 26(b) and Rule 34 and Rule 35 Physical Examinations and reports thereof. (3)

The full return, an access to medically necessary therapeutic treatment plan "4000 calories per day, high vitamins bland diet, to include supplements. (2) two Ensure drinks per day, (1) one vitamin pill each day and 500 calories ~~at night~~ night bag (see motion to Compel for specific details of this therapeutic treatment plan.)

The Defendants bear all past, present and future Appellant in Court (appellate) costs, such as I, F.P. payments, initial Complaint fees, any extra judicial function and/or exploitations, including but not limited to the Clerks help, any copying services needed, necessary for access to the Courts, due to Appellants indigent status and Defendants impediments and efforts to delay the establishment of Plaintiff's claims. The costs of any witnesses who may be used at trial, including Court appointed officials versed in the medical and psychiatric field and any specialist (witnesses) service's rendered in movants quest to ensconce his claims and/or present evidence in favor of refutation; the decelerating of Legal Jargon, and mental health and medical evaluations.

Permanent Restraining Order or Injunction directed towards Lt./mz. Morrow, and Dr. Burke, the primary culprits of S.C.I. ALBION staff, from any ADDITIONAL CORRECTION

③ under the HABEAS Corpus AD-testificandum 28 U.S.C §2241 ACT.

of DOC employee's, in their vicious, venomous DESIRE to pur-
posely inflict PAIN AND SUFFERING UPON PRESTON CATCHINGS, AN
OTHER INMATES UNDER PENAL SEPARATION, IN PROFESSIONAL MEDICAL
TRANSGRESSION, TO COMMIT MURDER, TO PREVENT ANY OTHER
DOC PERSONAL from the ACTS, OR INVOLVEMENT of putting
"DRUGS AND MIND ALTERING CHEMICALS, OR ANY TYPES, TEXTURES
OR STRAINS OF ACID'S IN PRESTON CATCHINGS, TOON'S, ON OR IN HIS
CLOTHING, SHOES, SHEETS, BLANKET'S, TOWEL'S OR ANY OTHER PROPERTY
POSSESSED BY PLAINTIFF AND OR ANY TYPES OF MEDICATION TO BE GIVEN
THE ABOVE NAMED AGGRAVATED, INJUNCTION AGAINST ALL PSYCHOLOGICAL
TORTURE, THE SCHEMES TO IMPLEMENT RETALIATION, HARASSMENT AND
OR ANY IMPROPER OR UNETHICAL MEDICAL TREATMENT IN THE FUTURE..

Moreover, INJUNCTIVE RELIEF EXPUNGMENT of this TYRANNICAL
PHYSICALLY ABUSIVE (13) THIRTEEN YEARS OF RESTRICTED HOUSING UNIT
(HOLE TIME) FORCED UPON AGGRAVATED, TO KEEP HIM STATIONARILY FOR
THE FOOD RELATED ASSAULT'S TO TAKE EFFECT, STATIONARILY, TO CENSOR
AN CONTACT IN-COMMING, OUT-GOING COMMUNICATIONS, WITH THE COURTS
AND THE PEOPLE(FAMILY) THAT MOVENT DESIRE CONTACT WITH, TO
KEEP PRESTON CATCHINGS, LOCK DOWN, IN ONE PLACE OF CONTROL, TO
MONITOR FOOD ASSAULT'S AN INTAKE, TO PROTECT THE METHODICAL
STRATEGEM ("MEDICALLY, REDOUND") FORCING PLAINTIFF INTO A COMATOZA
STATE OF MIND, BY ACID ASSAULT'S TO THE LIVER'S MEMBRANOUS
TUBULAR NERVOUS SYSTEM, (THE VERTEBRATE INSIDE OF THE LIVER) THERE-
AFTER, IN INADEQUATE FOOD SUPPLIES ("NUTRIMENTAL STAGNATION"), THE
CONSEQUENCES, BRAIN CELL DEATH AND/OR ORGAN DESTITUTE COMATOZA
STATE OF MIND, DUE TO THE ACID RUINED VERTEBRATE UNABILITY TO
DIRECT THE SYNTHESIZING AND STORE THE SPECIALIZED PROTEINS,
AND BIOCHEMICAL HORMONES, AND SECRETE TO THE BRAIN AN ORGANS
WHEN REQUISITIONED, NECESSARY TO EFFECT PHYSIOLOGICAL ACTIVITY.

Further SANCTION ARE REQUESTED IN ACCORD WITH FEDERAL RULES
CIVIL PROCEDURE, THE (6TH) SIXTH AMENDMENT OF OUR CONSTITUTION,
AND 42 U.S.C.S.A. § 4019 SANCTIONS, IMPLIED FOR FAILURE TO COMPLY
WITH COURT ORDERS, AT MOTION TO COMPEL AND THE HEARING
THEREOF, FURTHER SANCTIONS ARE INDICATED FROM THE INFERRED

Failure to participate in the framing of a DISCOVERY PLAN, REQUIRED BY FEDERAL Rules Civil Procedure 9. 26(g) AND/OR failure to disclose; "false or misleading Disclosure," Refusal to Admit, R. 26(c), in conjunction with Evasive or Incomplete Disclosure or Responses, R. 37 A(2),~~3~~ AND failure to cooperate in DISCOVERY SANCTION FED. Rules Civil Procedure Rule 37 B., SANCTION BY the Court.

R. 37 B.2(B) AN ORDER refusing to allow the DISOBEDIENT party to support or ~~oppose~~ DESIGNATED claims or defenses, or prohibiting that party from introducing DESIGNATED REBUTTALS.

R. 37 B.2 (C) An ORDER striking out Summary Judgment, medical Reports in evidence, and misrepresentations Declarations, psychiatric and medical documents, presented to this Court., An ORDER staying further proceeding until the ORDER is OBEYED., Dismissing the ACTION or proceeding or ANY part thereof, or rendering A JUDGMENT BY DEFANT AGAINST the DISOBEDIENT party

R. 37 B.2(D) (in relevant part) in ADDITION to the ABOVE SANCTION, AN ORDER treating AS A contemot of Court the failure to OBEY ANY AND ALL ORDERS, including those stated ABOVE, (anticipating modicum EVID.)

R. 37 B.2 (E) Where a party has failed to comply with AN ORDER under 35(A), requiring that party to, yield AN GRANT, the medical Testing procedures, (stated ABOVE), REQUESTED IN PETITION FOR INSPECTION AND COPYING OF DOCUMENTS AND IN MOTION, TO COMPEL AND ALL OTHER ADDRESSES to the DEFENDANTS AND THE COURT. "IN ADDITION to the ABOVE" the Court shall require the party failing to OBEY Court Orders, FED. R. CIV. PRO, 26, 35, 36 AND Rule 37, with THE ATTORNEY ADVISING that party, TO PAY THE EXPENSES RATIONALIZED ABOVE INCLUDING ATTORNEY FEES AND DAMAGES SUSTAINED, DURING PURPOSEFUL DELAY'S TO PROTECT OR CONSUMMATE Plaintiff's DEATH."

IN justified augmentation to the SANCTION PRAYED for ABOVE Aggrieved Beseeches this Courts APPROVAL of (20.000) twenty Thousand DOLLAR'S to acquire ASSISTANCE of A LAWYER, to protect

detentioning, PAYABLE directly to Preston Catchings #BJ8956, that he mite personally choose a Lawyer an be able to dictate the contract. Allocate some of the monetary an compensatory damage payments, spelled out in the initial Complaint.. Including any additional Sanctions this Court deems necessary to compel compliance with the exact precision of the request for production of documents petition, and the federal Rules Civil Procedure Rules 26, 34, 35 and 37.

All punitive, monetary and compensatory SANCTIONS PRAYED for, are related to injuries sustained during the corse of this litigation, case no# 03-284 Eric. That's before this Court at present.. For the ABOVE implored SANCTIONS Aggrieved will pray.

enclosed: Cert. SERV.

7/8/2005

respectfully submitted

~~BJ8956~~

BJ8956

Preston Catchings inst. no#BJ8956,
I, A-8, State Correctional Facility
at Cresson P.O. Box "A", Old
Route 22 Cresson P.A.
zip 16699-0001

In the United States District Court
for the Western District of Pennsylvania 7/8/2005

Preston Catchings

vs
Mr. Morrow et al.

Civil Action No. 03-284 Erie
before: The Hon. Judge McLaughlin

Certificate of Service

I, Preston Catchings #J8956, hereby certify that a true
and correct copy of the foregoing "Motion for SANCTION", is
being served upon the following persons, by first class mail, at
the same time it being mailed to the Courts, this 8th day
7 month of the year 2005. (7/8/2005.)

Office of the Attorney General
Mr. Scott A. Bradley Esq. (Sen. Deputy Att. Gen.)
6th Floor Manor Complex, 564 Forbes Ave.
Pittsburgh Pennsylvania zip 15219.

enclosure: Motion for SANCTION.

Respectfully Submitted

~~Preston Catchings #J8956~~
~~I.A.S. SCI CRESSON~~
~~P.O. BOX "A" OLD Route 22~~
~~CRESSON PA. 16699.~~